

AR 201-13183

COURTNEY M. PRICE
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**American
Chemistry
Council**
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September 10, 2001

Honorable Christine T. Whitman
Administrator, U.S. EPA
P.O. Box 1473
Merrifield, VA 22116

RE: Chemical Right-to-Know Program - Assessment Plan and Robust Summaries for the
Acetic Acid and Salts Category, Registration Number

Dear Administrator Whitman:

The American Chemistry Council Acetic Acid and Salts Panel (Panel) submits for review and public comment a revision of Appendix 1 of its assessment plan report for the Acetic Acid and Salts Category under the U.S. Environmental Protection Agency's (EPA) High Production Volume Chemical Challenge Program. The Panel submitted its assessment plan report and robust summaries to EPA on June 28, 2001. A computer diskette containing the electronic version of the revised Appendix is included with this package.

The Panel revised Appendix 1 in response to comments provided by EPA to Laurie Miller, the Panel Manager, via telephone on August 21, 2001.

EPA requested that these comments be addressed before posting the Panel's submission package for public comment. The Panel responded to these comments in a letter faxed to EPA on September 7, 2001, and submits a revised Appendix 1 for posting on the public web site along with the original assessment plan report and robust summaries submitted in June.

Thank you in advance for attention to this matter. If you have any questions regarding the assessment plan report or robust summaries, please contact Laurie Miller. She can be reached at 703-741-5611 (telephone), 703-741-6091 (telefax) or laurie_miller@americanchemistry.com (email).

Sincerely yours,

Enclosures: Revised Appendix 1 in hard copy and on diskette

cc: Ralph Northrop
Oscar Hernandez
Charles Auer
Steve Russell



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September 7, 2001

VIA FACSIMILE

Mr. Ralph C. Northrop
7403M
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington D.C. 20460

RE: Chemical Right-to-Know Program - Assessment Plan and Robust
Summaries for the Acetic Acid and Salts Category, Registration Number

Dear Mr. Northrop:

On behalf of the Acetic Acid and Salts Panel (Panel) of the American Chemistry Council, I am providing responses to your August 21, 2001 comments (via telephone) on the Panel's U.S. HPV assessment plan report and robust summaries for the Acetic Acid and Salts Category under the U.S. Environmental Protection Agency's (EPA) High Production Volume Chemical (HPVC) Challenge Program, submitted to EPA on June 28, 2001. The Panel's responses to these comments are provided in the Attachment to this letter.

The Panel understands that EPA would like it to address these comments prior to public posting of its submission package for the 120-day review period. The Panel has revised Appendix 1 of the assessment plan report based on your comments, and will provide EPA with a revised version of Appendix 1 in hard copy form and on diskette. This revision will be mailed to EPA at the Merrifield, Virginia address in care of the Honorable Christine T. Whitman within two business days.

The Panel appreciates EPA's detailed review of the submission package, and looks forward to addressing additional comments that may be generated by EPA and the public during the 120-day review period. If you have any questions regarding the



Mr. Ralph Northrop
September 7, 2001
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Attachment, please contact me at 703-741-5611 (telephone), 703-741-6091 (telefax) or laurie_miller@americanchemistry.com (email).

Sincerely yours,

Laurie A. Miller
Manager, CHEMSTAR
Manager, Acetic Acid and Salts Panel

cc: Oscar Hernandez
Charles Auer
Steve Russell

Attachment

**Attachment: Acetic Acid and Salts Panel (Panel) responses to comments provided by Mr. Ralph Northrop (EPA Headquarters) via telephone on August 21, 2001.
to Laurie Miller (Panel Manager)**

1. **Comment:** Appendix 1, Page 5 of 6: In the "Citric Acid" column, and "Acute Toxicity by Other" row, Yokotani, et al., should be referenced as a source with corresponding data, based on Section 5.1.4 "ACUTE TOXICITY BY OTHER ROUTES OF ADMINISTRATION," subsections (i) and (j) on pages 48 and 49 of the robust summaries.

Response: The appropriate reference and corresponding data have been inserted into the table for this chemical and endpoint.

2. **Comment:** Appendix 1, Page 6 of 6: In the "Citric Acid, Tripotassium Salt" column, "Genetic Toxicity in-vitro (Bacterial Test)" row, the reference to the Ishidate et al., 1984 study and corresponding data are not included in Section 5.5 "GENETIC TOXICITY IN VITRO," Subsection A "Bacterial Test" of the robust summaries (starts on page 60).

Response: The Ishidate et al. 1984 study and corresponding data are listed in the robust summaries in Section 5.5 A (j) for monosodium citrate (pages 64 and 65), and should not have been listed for "Citric Acid, Tripotassium Salt" column, "Genetic Toxicity in-vitro (Bacterial Test)" row. This reference has been replaced with the correct reference, Litton Bionetics, Inc. 1975, which is located in Section 5.5 A (i) of the robust summaries (page 64).

3. **Comment:** It would be extremely helpful to have a table in the assessment plan (in the text or Appendix 1) that shows a simple summary of the assessment plan. For example, this table would show chemical versus endpoint, with indicators (e.g., letters, symbols, etc.) of the status of data/testing need for each chemical and endpoint, and footnotes defining the indicators.

Response: Currently, the summary table in Appendix 1 provides the reader with a brief summary of the endpoint data and corresponding data sources, where available, for the category chemicals, rather than generic indicators of data/testing need status. The table presents this information in essentially the same format as that requested for the simpler table (i.e., chemical versus endpoint).

The Panel agrees with EPA that an additional, relatively simple table summarizing the assessment plan may be helpful to the reader. However, the Panel believes that the current summary table in Appendix 1 meets the requirements of the HPVC Challenge Program. To improve the readability of the table, it has been reorganized so that the information for all endpoints is listed on one page for each chemical rather than two pages, and the font size has been increased. The revised table will be provided to EPA in hard copy form and on diskette within two business days.